



STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Pursuant to 47 C.F.R. § 64.6305, Farmers Mutual Telephone Company submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Farmers Mutual Telephone Company has in place to mitigate illegal robocalls. Farmers Mutual Telephone Company may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities, and its needs.

STIR/SHAKEN Implementation

Farmers Mutual Telephone Company will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Farmers Mutual Telephone Company is registered with the STI-PA and has its own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that it uses when authenticating calls it originates. This is a managed end-to-end call authentication solution supplied by TransNexus that fully satisfies the FCC's STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

Farmers Mutual Telephone Company has implemented this solution in the IP portions of its network.

- ☐ My traffic is fully attested.
- ☒ My traffic is partially attested.
- ☐ None of my traffic is yet attested, however I have implemented the Robocall Mitigation Plan outlined below.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that the Company has implemented to detect and prevent illegal robocalls on its network. The Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should the company determine that changes are appropriate, its practices may differ from those described below.

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Risk Assessment. Farmers Mutual Telephone Company is a voice service provider offering a variety of voice calling services. Its customers generally do not originate high volume calls and Farmers Mutual Telephone Company has not received information suggesting that robocalls are originated on its network. Therefore, Farmers Mutual Telephone Company does not consider its network at high risk of originating illegal robocalls.

Farmers Mutual Telephone Company has not been prohibited from filing a certification in the Robocall Mitigation Database.

Farmers Mutual Telephone Company does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

SPECIFIC MEASURES TO IDENTIFY AND PREVENT ILLEGAL ROBOCALLS

Know Your Customer: Farmers Mutual Telephone Company conducts due diligence on new and renewing customers, confirming the customer's identity and, if it is a business, its incorporation documents. The Company confirms the customer's service address for all customers.

- Farmers Mutual Telephone Company verifies customer information when contracts are renewed or services are added.
- Farmers Mutual Telephone Company verifies the customer's identity and their right to use the telephone number presented on calls.
- Farmers Mutual Telephone Company has policies that define the circumstances by which it will deny, suspend or terminate service to a customer.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- Farmers Mutual Telephone Company has in place an enforceable terms of use and/or an acceptable use policy.
- Farmers Mutual Telephone Company uses call analytics software by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls. The software provides detailed reporting to identify suspected illegal robocalls. The system alerts the Company if it processes outbound calls

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where the calling number has a poor reputation or is invalid, unallocated, or on the Industry Traceback Group's Do Not Originate registry. The Company performs the same mitigation steps for all outbound calls regardless of its role in the call chain for a particular call.

- If Farmers Mutual Telephone Company has a reasonable basis to believe that a caller or upstream provider is attempting to originate or transit illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, Farmers Mutual Telephone Company can suspend and/or terminate service to the customer.

Responding to Traceback Requests

- Farmers Mutual Telephone Company has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual. It will provide the ITG with the contact information and business hours for those individuals upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-traceback-group-itg/for-providers/>
- Farmers Mutual Telephone Company will respond within 24 hours to traceback requests from the Commission, law enforcement, and the registered traceback consortium. The Company cooperates fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls.

Know Your Upstream Provider

Farmers Mutual Telephone Company exercises due diligence before accepting traffic from an upstream provider. The Company collects the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

The Company also confirms the upstream provider is listed in the Robocall Mitigation Database, reviews the carrier's Robocall Mitigation Plan, and will not accept voice traffic from an unregistered provider. If the Company finds that an upstream provider is sending suspicious robocalls the Company warns them to stop. If such traffic continues then the Company terminates their service.

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Cooperation with State and Federal Regulators

Farmers Mutual Telephone Company will cooperate with state and federal regulators to prevent any and all illegal robocalls. Specifically, Farmers Mutual Telephone Company will:

- Respond to valid law enforcement requests;
- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Farmers Mutual Telephone Company has deployed call authentication, call labeling, and call blocking services provided by TransNexus ClearIP. The Company has made great strides to protect its networks and consumers from harmful calls. Farmers Mutual Telephone Company is pleased to play a role in that improvement and will continue the necessary work to protect its customers.

Sincerely,
Tyler Laird
Network Operations Manager
Farmers Mutual Telephone Company

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